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11 United States of America

12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION  
15

16 IN THE MATTER OF THE SEIZURE ) Case No. 2:22-CM-00094  
17 OF \$500,100.00 IN U.S. CURRENCY )  
18 ) STIPULATION EXTENDING UNITED  
19 ) STATES OF AMERICA'S TIME TO  
20 ) FILE COMPLAINT FOR FORFEITURE;  
21 ) [PROPOSED] ORDER THEREON LODGED  
22 ) UNDER SEPARATE COVER  
23 )  
24 )

21 It is hereby stipulated by and between the United States of  
22 America ("United States" or "the government"), on the one hand,  
23 and claimant Hong Sun (the "claimant"), on the other hand, by and  
24 through their respective attorneys, as follows:

25 1. Pursuant to the claim that the United States alleges  
26 was received by the Federal Bureau of Investigation (the "FBI")  
27 on February 16, 2022, claimant filed a claim in the FBI  
28 administrative forfeiture proceedings to \$500,100.00 in U.S.

1 Currency (United States Asset Identification Number 21-FBI-  
2 003265), (the "property.")

3 2. It is the United States' position that the FBI sent the  
4 written notice of intent to forfeit required by 18 U.S.C.  
5 § 983(a)(1)(A) to all known interested parties, the time has  
6 expired for any person to file a claim to the property under 18  
7 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has  
8 filed a claim to the property as required by law in the  
9 administrative forfeiture proceedings.

10 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is  
11 required to file a complaint for forfeiture against the property  
12 alleging that the property is subject to forfeiture within 90  
13 days after a claim has been filed in the administrative  
14 forfeiture proceedings, which in this case would be May 17, 2022,  
15 unless the court extends the deadline for good cause shown or by  
16 agreement of the parties.

17 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties  
18 wish by agreement to extend to August 15, 2022 the time in which  
19 the United States is required to file a complaint for forfeiture  
20 against the property alleging that the property is subject to  
21 forfeiture, so that the government can investigate this matter  
22 and determine whether this matter can be settled without the  
23 government having to initiate a civil judicial forfeiture action.

24 5. Claimant knowingly, intelligently, and voluntarily  
25 gives up any right claimant may have under 18 U.S.C. §  
26 983(a)(3)(A)-(C) to require the United States to file a complaint  
27 for forfeiture against the property alleging that the property is  
28 subject to forfeiture by August 15, 2022 and any right claimant

1 may have to seek dismissal of any complaint on the ground that it  
2 was not filed on or before such date.

3 6. The parties agree that the deadline by which the United  
4 States shall be required to file a complaint for forfeiture  
5 against the property alleging that the property is subject to  
6 forfeiture shall be extended to August 15, 2022.

7 SO STIPULATED.

8 DATED: May 11, 2022

TRACY L. WILKISON  
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13 /s/Victor A. Rodgers  
14 VICTOR A. RODGERS  
Assistant United States Attorney  
15 Attorneys for  
16 United States of America

18 DATED: May 11, 2022

THE FREEDMAN FIRM, PC

20 /s/per email authorization  
21 MICHAEL G. FREEDMAN  
22 Attorney for Claimant  
23 HONG SUN  
24  
25  
26  
27  
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**PROOF OF SERVICE**

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, California 90012.

On **May 11, 2022**, I served a copy of **STIPULATION EXTENDING UNITED STATES OF AMERICA'S TIME TO FILE COMPLAINT FOR FORFEITURE** upon each person or entity named below:

☒ By Electronic Mail: By transmitting said document(s) to the email address(es) listed below.

**TO: The Freedman Firm**  
**Michael G. Freedman**  
**800 Wilshire Blvd.**  
**Los Angeles, CA 90017**  
[michael@thefreedmanfirm.com](mailto:michael@thefreedmanfirm.com)

**Attorney for Claimant**  
**Hong Sun**

I declare under penalty of perjury under the laws of the United States of America that I am employed in the office of a member of the bar of this Court, at whose direction the service was made, and that the foregoing is true and correct.

Executed on **May 11, 2022** at Los Angeles, California.

*/s/ Tara Vavere*

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**TARA VAVERE**

Paralegal, FSA